



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

RCH/AXB/LAZ  
F. #2022R01030

*610 Federal Plaza  
Central Islip, New York 11722*

April 9, 2024

By E-mail

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Re: United States v. George Anthony Devolder Santos  
Criminal Docket No. 23-197 (S-1) (JS)

Dear Counsel:

The government writes in response to your letter dated April 8, 2024, in which you (a) request a 30-day extension to the motion schedule, (b) make certain requests for discovery, and (c) make certain requests for a bill of particulars.<sup>1</sup>

First, the government objects to your request for a 30-day extension of the motion schedule. The motion schedule was jointly agreed to by the parties after significant negotiation, see Dkt. No. 58, and adopted by the Court in reliance upon that agreement, see Dkt. No. 59. You identify no compelling basis to adjourn the motion schedule, relying solely on belated discovery requests submitted nearly one year after this case first began.

With respect to your first discovery request, the government is well aware of and will comply with its disclosure obligations under Brady v. Maryland, 373 U.S. 83 (1963) and Giglio v. United States, 405 U.S. 150 (1972), and their progeny. To the extent your letter

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<sup>1</sup> The government notes that, in both your letter dated April 5, 2024 and your letter dated April 8, 2024, you have set arbitrary and artificially tight deadlines for the government's response, without identifying any justification, much less a compelling one, for such. Please note that the government will comply with deadlines either mutually agreed upon by the parties or set by the Court, not those unilaterally imposed by the defense.

